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To Group A-AND-R-DOCKET@EPA  
cc  
bcc

Subject RFS Waiver Request

I am firmly against the EPA waiving the RFS requirements for 2008 or any other year. I don't believe Ethanol has had any significant effect on food prices and reducing the amount of ethanol produced will not result in a drop in food prices in the short term to any significant degree. My reading indicates that our corn crop in 2007 increased by about 30% from 12 Billion bushels to 15 Billion bushels. Using the standard conversion rate of 2.87 gallons of ethanol can be produced from 1 bushel of corn, that means just the increased corn production of 3 billion bushels could have yielded in 8.61 Billion gallons of ethanol. We produced only 6.5 billion gallons of ethanol in 2007. In other words, we didn't even use up the additional production bushels last year. Or to say it another way, in 2007 we used about 2.3 billion bushels of corn to produce the 6.5 billion gallons. That means we had over 700 million bushels more corn on the market for non ethanol needs in 2007 than we had in 2006. If we had more corn at market than the year before how can anyone say ethanol drove up food prices. This doesn't even address the fact that ethanol is made from field corn that goes to livestock, not sweet corn that goes to human consumption.

However, even if ethanol did drive up food prices, at least the money we spent on the ethanol fuel all remained in the US. When we buy ethanol we are not sending some percentage of our dollars out of the country as we do when we buy oil. The true culprit for food prices rising is the energy costs not ethanol.

I urge you not to give in to election year antics being played by politicians searching for votes and popular sound bites. Do what is right for the country and keep the RFS in place.

Thank you.

**Jim Roberts**

**Vice-President, SF/PIR Operations**

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